REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested.

Claims 1, 4-14, 17-27, 30-40 and 43-52 are pending in the application. The subject matter of dependent claims 2 and 3 has been incorporated into base claim 1. The subject matter of dependent claims 15 and 16 has been incorporated into base claim 14. The subject matter of dependent claims 28 and 29 has been incorporated into base claim 27. The subject matter of dependent claims 41 and 42 has been incorporated into base claim 40. Claims 4, 17, 30 and 43 have been amended to be dependent upon their respective independent base claims in light of the cancellation of their previous dependent base claims. No new issues or new matter have been added. Claims 2, 3, 15, 16, 28, 29, 41 and 42 have been canceled without prejudice and Applicant reserves the right to pursue the subject matter of original claims 1, 14, 27, and 40 in a continuation application.

Applicant's counsel thanks Examiner Londra C. Burge and Primary Examiner Cesar Paula for the courtesy extended during the personal interview conducted on April 20, 2005. It is believed that the interview materially advanced the prosecution of the present application.

The rejection of claims 1-2, 4-15, 17-28, 30-41, and 43-52 under 35 U.S.C. § 102(e) as being anticipated by Abjanic is mooted by the amendments set forth above to incorporate the subject matter of claims 3, 16, 29, and 42 into their respective independent base claims. The Examiner admits that claims 3, 16, 29 and 42 are not anticipated by Abjanic. See page 7 of the Office Action. Accordingly, withdrawal of the Section 102 rejection of claims 4-12, 17-26, 30-39 and 43-52 is respectfully requested.

The rejection of claims 3, 16, 29 and 42 under 35 U.S.C. § 103(a) as being unpatentable over Abjanic as applied to claims 1, 14, 27 and 40, in view of U.S. Publication No. 2002/0198974 A1 (Shafer) is respectfully traversed. Applicant respectfully submits that the subject matter of claims 3, 16, 29 and 42 is not obvious over the theoretical combination of Abjanic and Shafer for the following reasons.

The Examiner admits that Abjanic does not disclose the use of the claimed vocabulary

library. Shafer also does not teach or suggest the claimed vocabulary library. See page 8, line 20 through page 9, line 9 of the present specification, which teaches that "the vocabulary library 30 is configured for storing vocabulary modules 32 <u>that enable the application resource 28 to interpret the prescribed attributes specified by the XML tags</u> within the message 14. If an XML header 14a includes tags that not recognized by the application resource 28, the application resource 28 may issue a request to an external source, for example the services registry 20, <u>for retrieval of the appropriate vocabulary module 32 for interpretation of the XML tags</u>." (Emphasis added.) Thus, the presently claimed router can dynamically reference the XML vocabulary library to learn the attribute function and thereby execute an XML tag for a heretofore unrecognized XML based protocol or service (e.g., SOAP, ebXML, Rosetta, etc., See page 6, line 6 of the present specification.)

In contrast, Shafer teaches that a network administrator can use the render library 70 to <u>configure</u> the router. The router in Shafer <u>does not</u> utilize the render library 70 during routing to understand routing attributes in XML language. Shafer specifically teaches that the render library 70 "<u>renders</u> the extracted information to a <u>human-readable format</u>... ." (See paragraph 50 of Shafer).

Assuming the references were combined, the resulting hypothetical combination <u>rendering to a human-readable format on a screen</u> still would not teach or even suggest the claimed vocabulary library such that the claimed "application resource" can interpret, for example, XML tags, to perform routing functions based on <u>retrieval</u> of syntax and semantics information from a selected vocabulary module. (See also page 8, lines 19-24 of the present specification). Shafer clearly teaches using ODL to <u>display</u> router <u>configured information</u> to <u>users</u> that <u>configured the router</u>. (See Abstract and paragraphs 50 and 53 of Shafer). There is no teaching or even a suggestion in either reference for the router to dynamically use a vocabulary library to interpret routing attributes in XML language.

Hence, the hypothetical combination does not accommodate different XML-based protocols as they are developed, but simply assumes a <u>static</u> configuration providing no flexibility in interpreting different XML-based protocols.

The Examiner argues in the present Final Office Action that:

> The applicant argues that a vocabulary library is not suggested and interpreting style sheets (Page 12 Lines 1-4). However, Shafer mentions a render library that contains style sheets, object definition language (ODL) files necessary to render XML output (Shafer Para 0050 and 0053) and since style sheets are used in web pages, XML which is also used for web pages should be able to interpret these style sheets. It would have been obvious to one of ordinary skill in the art to apply Shafer to Abjanic, providing Abjanic the benefit of having a render language library, which could be used for vocabulary, for the client application to access for rendering support and to render outputs based on the contents of XML style sheets and ODL files as taught by Shafer Paragraph 0053.

As discussed above, Shafer only teaches <u>rendering</u> "the extracted information to <u>human-readable</u> format using render library 70." (emphasis added.) See paragraph 50 of Shafer. Shafer does not teach or suggest that the render library 70 and router are configured such that the router accesses the library to <u>interpret</u> XML attributes for routing.

Further, the <u>client application</u> of Shafer referred to by the Examiner is very different from the claimed application resource. The claimed application resource utilizes the library to <u>interpret</u> XML attributes during routing. The client application of Shafer only "accesses the render library (100) for rendering support" to provide human readable format for a network administrator during <u>configuration</u> of the router. There is no equivalences between the "client application" of Shafer and the presently claimed "application resource."

Applicant submits that the Examiner has improperly used the present disclosure as a template to piece together unrelated elements from the cited references and to use hindsight gleaned from the present application to fill in the gaps of the cited references. "It is impermissible to use the claimed invention as an instruction manual or 'template' to piece together the teachings of the prior art so that the claimed invention is rendered obvious." <u>In re Fritch</u>, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992).

In view of the many differences between the combination of references and claim 3, 16, 29 and 42, withdrawal of the Section 103 rejection is respectfully requested.
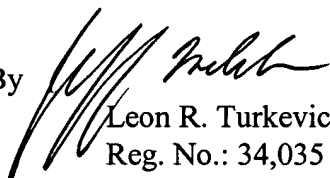
Since all of the objections and objections of record have been addressed, it is believed

that the application is in condition for allowance and Notice to that effect is respectfully requested.

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 95-466, and please credit any excess fees to such deposit account.

Respectfully submitted,

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